

# SOUTHERN ENVIRONMENTAL LAW CENTER

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May 21, 2018

**Via Electronic Mail**

K. Chad Burgess, Esquire  
Matthew W. Gissendanner, Esquire  
South Carolina Electric & Gas Company  
220 Operation Way  
MCC222  
Cayce, SC 29033-3701

**RE: South Carolina Coastal Conservation League and Southern Alliance  
for Clean Energy's First and Continuing Request for Production of  
Documents for the Consolidated Docket Nos.:  
2017-207-E, 2017-305-E, 2017-370-E**

Dear Mr. Burgess and Mr. Gissendanner:

Please find attached the South Carolina Coastal Conservation League ("CCL") and Southern Alliance for Clean Energy's ("SACE") First and Continuing Request for Production of Documents to South Carolina Electric & Gas in Consolidated Docket Nos. 2017-207-E, 2017-305-E, 2017-370-E. If any of the responsive documents are deemed confidential by the Company, please forward a confidentiality agreement.

To the extent that any documents responsive to this First and Continuing Request for Production of Documents have already been produced in response to an informal data request by the Coastal Conservation League, served on July 14, 2017 in Docket No. 2017-207-E, it is not necessary for SCE&G to re-produce those documents in response to the current request. Instead, they may be incorporated by reference in the Company's response to the current request.

Please contact me if you have any questions concerning this filing.

Sincerely,



William Cleveland  
Blan Holman  
Elizabeth Jones